

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

SHAWN SILVER,

Plaintiff,

v.

SPILL THE TEA, INC.,
a Delaware corporate, AWDTS, Inc., a
Delaware corporation, TRANSGLOBAL
ASSETS INC., et al.

Defendant(s).

CASE No. 0:25-cv-61308-KMM

UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Defendant Meta Platforms, Inc. (“Meta”), by and through its undersigned counsel, pursuant to Local Rule 7.1(e), hereby respectfully moves the Court to extend the time for Meta to respond to the Complaint in this action until September 2, 2025, without waiving any defenses, rights, or other matters that may be presented under Federal Rule of Civil Procedure 12(b) or any other rule or law. Plaintiff consents to this Motion.

Meta respectfully states the following as good cause in support of its request for an extension of time:

1. Counsel for the parties have met and conferred regarding this motion, and Plaintiff consents to the relief requested herein.
2. The Complaint in this action was filed on June 27, 2025. Meta was served with the Complaint and Summons on July 14, 2025.
3. On July 25, 2025, Meta filed an unopposed motion to extend time to respond to the Complaint (ECF No. 11) seeking a 21-day extension of time in which to respond. The same date, July 25, 2025, by paperless order, Judge Rosenberg granted in part and denied without prejudice in

part Meta's Motion, allowing Meta until August 18, 2025 to respond to Plaintiff's Complaint (ECF No. 12).

4. Subsequently, on August 4, 2025, this case was reassigned to this Court for all further proceedings (ECF No. 14).

5. On August 7, 2025, counsel for Meta and counsel for Plaintiff conferred by telephone during which counsel for Plaintiff agreed to provide certain additional background information in order to allow Meta to investigate the allegations of Plaintiff's Complaint.

6. Meta respectfully submits that it would be beneficial for Meta to have additional time to investigate Plaintiff's allegations with the information that Plaintiff will be sharing, before Meta must respond to the Complaint. Meta therefore requests a 15-day extension of the time for Meta to respond to the Complaint, from August 18, 2025 until September 2, 2025.

7. This extension will not cause prejudice or unduly delay the litigation, and Plaintiff has consented to this extension.

8. Additionally, in accordance with this Court's August 5, 2025 Pretrial Order (ECF No. 16), Meta is seeking this extension in a timely fashion sufficiently prior to expiration of Meta's current deadline. Meta also makes this request in good faith in order to advance the parties' understanding of the claims and defenses.

9. District courts have broad discretion in managing their cases, and motions requesting additional time are normally granted absent bad faith or prejudice. *See Chrysler Int'l Corp. v. Chemaly*, 280 F.3d 1358, 1360 (11th Cir. 2002).

For the foregoing reasons, Meta respectfully moves that the date for filing any response to the Complaint in this action, including by answer, motion, or other pleading of any type, be extended until September 2, 2025.

Southern District of Florida Local Rule 7.1 Certification

Pursuant to Local Rule 7.1(a)(3), on August 7, 2025, counsel for Meta conferred with counsel for Plaintiff via telephone and on August 8, 2025 via email regarding the extension requested herein. Plaintiff does not oppose the relief requested.

Date: August 11, 2025

Respectfully submitted,

/s/Diana Marie Fassbender

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